

# **EXHIBIT CC**

May 6, 2020

**VIA EMAIL**

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Re: *Grae v. Corrections Corp. of America, et al.*, No. 3:16-cv-02267

Counsel:

Pursuant to the Court’s April 30, 2020 Order (Dkt. No. 211) (the “April 30 Order”), enclosed as Exhibit A is an updated privilege log that “include[s] the counsel and legal staff involved for each document withheld as privileged.” See April 30 Order at 10, 23.

Additionally, the Court found that CORECIVIC\_0959395 was not privileged. *Id.* at 20, 23. Defendants, therefore, have updated their redaction log to remove that document.<sup>1</sup> Defendants’ updated redaction log is enclosed as Exhibit B. Because Plaintiffs have CORECIVIC\_0959395 in their possession (*see* Plaintiffs’ Motion to Compel, Ex. 4, Dkt. No. 196-4), Defendants are not producing another copy of that document. For purposes of identifying the document, the parties may use the document’s original bates number (CORECIVIC\_0959395), and can disregard the updated bates number, which was intended to identify the redacted version of the document (CORECIVIC\_1795412).

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<sup>1</sup> CORECIVIC\_1795142 – the redacted version of CORECIVIC\_0959395 – was removed from Defendants’ redaction log.

LATHAM & WATKINS LLP

With production of these updated logs, Defendants have fully complied with the Court's April 30 Order.

Best regards,  


Eric C. Pettis  
of LATHAM & WATKINS LLP

Encl.

CC: David Schindler  
Brian Glennon  
Sarah Tomkowiak  
Steve Riley  
Trey McGee  
Morgan Whitworth  
Dennis Herman  
Willow Radcliffe  
Christopher Wood  
Jason Forge  
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